



201-15875

April 1, 2005

The Dow Chemical Company
Midland, Michigan 48674
USA

Via Certified Mail 7000 1530 0005 1754 9384

Jim Willis (7405M)
USEPA Headquarters
Ariel Rios Building
1200 Pennsylvania Avenue NW
Washington, DC 20460

Diane Sheridan (7405M)
USEPA Headquarters
Ariel Rios Building
1200 Pennsylvania Avenue NW
Washington, DC 20460

RECEIVED
OPPT CRIC
05 MAY -9 PM 2:08

CASRN 1929-82-4, 2-CHLORO-6-(TRICHLOROMETHYL)-PYRIDINE
PUBLICLY AVAILABLE INFORMATION TO ADDRESS EPA HPV CHALLENGE

Dow is providing publicly available hazard information for the endpoints identified in the EPA HPV Challenge for 2-chloro-6-(trichloromethyl)-pyridine. As indicated to the Agency in previous communications, this substance is a pesticide regulated by FIFRA in the U.S. and is used exclusively as an intermediate to another pesticide. Dow believes these conditions are sufficient to exempt this substance from the EPA HPV Challenge. Nearly five years after our request for exemption of 2-chloro-6-(trichloromethyl)-pyridine from the EPA HPV Challenge, the Agency notified Dow our request was not accepted. November 11, 2004, Dow sent a letter to EPA stating its commitment to provide publicly available information on this substance for the endpoints within the EPA HPV Challenge.

The EPA Reregistration Eligibility Decision (RED) Document is scheduled to publish in April, 2005, on the EPA website as Case 0213: <http://cfpub.epa.gov/oppref/rereg/status.cfm?show=rereg> The RED will contain publicly available information for EPA HPV endpoints.

Until the RED document publishes on the EPA website, the information is publicly available in Docket OPP-2004-0283. Documents in the docket include physical and chemical properties, toxicology study results for acute, subchronic, chronic, developmental, reproductive, mutagenicity, metabolism, dermal absorption endpoints as well as epidemiological information, environmental fate and transport results, and ecological testing results in aquatic and terrestrial plants and animals.

We believe this submission satisfies the EPA HPV Challenge commitment to provide publicly available basic health and safety information on this substance. We ask that this substance be removed from EPA's HPV Orphans List and Annex A of the 55th ITC report.

Sincerely,

Linda C. Burgert
EH&S Product Regulatory Management
PH: 989-636-1011
FAX: 989-638-9933
E-MAIL: lburgert@dow.com

jt

cc: John Walker, USEPA Headquarters, Washington, DC